

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

**TRUSTEE’S WITNESS AND EXHIBIT LIST FOR OCTOBER 13, 2022 FINAL SALE HEARING ON:
TRUSTEE’S MOTION TO APPROVE (A) SALE OF PROPERTY OF THE ESTATE OF
DEEPROOT FUNDS, LLC, (B) SALE PROCEDURES IN CONNECTION WITH THE SALE OF
PROPERTY OF THE ESTATE OF DEEPROOT FUNDS, LLC, AND (C) THE FORM OF NOTICE FOR
THE SALE OF PROPERTY OF THE ESTATE OF DEEPROOT FUNDS, LLC
[RELATING TO ECF No. 147]**

John Patrick Lowe, Chapter 7 Trustee (“Trustee”), files this Witness and Exhibit List for the October 13, 2022 Final Sale Hearing scheduled relating to the matters listed below.

MATTERS TO BE HEARD:

Trustee’s Motion to Approve (A) Sale of Property of the Estate of deeproot Funds, LLC, (B) Sale Procedures in Connection with the Sale of Property of the Estate of deeproot Funds, LLC, and (c) the Form of Notice for the Sale of Property of the Estate of deeproot Funds, LLC (the “Sale Motion”)¹.

TRUSTEE’S WITNESSES:

Trustee designates the following witnesses:

1. J. Patrick “Pat” Lowe, Chapter 7 Trustee of the jointly administered bankruptcy estates
2. Any witness called or designated by any other party;
3. Any rebuttal or impeachment witnesses, as necessary; and
4. Any person present at the Hearing (live or via WebEx)

Trustee reserves the right to amend or supplement this list at any time prior to the hearing.

¹ Capitalized terms unless otherwise defined herein shall have the same meaning as ascribed to them in the Sale Motion

TRUSTEE'S EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Order Approving Sale Procedures [ECF 159]				
2	Trustee Notice of Sale with Bid Procedures – as approved at 9/13/22 Hearing and as mailed out on 9/14/22				
3	Certificate of Service of Trustee Notice of Sale with Bid Procedures [ECF 161]				
4	Purchase and Sale Agreement by and between Trustee and CCW Braun Heights LLC (EXH C to ECF No. 147)				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

Trustee reserve the right to amend or supplement this list at any time prior to the hearing.

Respectfully submitted,

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**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY
ADMINISTERED CASE OF IN RE DEEPROOT
CAPITAL MANAGEMENT, LLC ET AL.**

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of October, 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document to the following parties requesting notice; a copy of the exhibits will be sent via email to these same parties.

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deeproot Pinball, LLC

deeproot Growth Runs Deep Fund, LLC

deeproot 575 Fund, LLC

deeproot 3 Year Bonus Income Fund, LLC

deeproot BonusGrowth 5 Year Debenture Fund, LLC

deeproot Tech, LLC

deeproot Funds, LLC

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c/o Christopher S. Murphy

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/

s

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R

s/ Randall A. Pulman

Randall A. Pulman